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Tax ID # 46-0418775

August 15, 2016

Invoice submitted to:

Mr. Steve Hofer

3309 South Fernwood Avenue
Sioux Falls, SD 57110

In Reference To: Client Code #247

Invoice #30550

Attorney: Scott Abdallah

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
2/22/2016	SA Review Initial Disclosures; telephone call with Attorney Arndt regarding claims notes; letter to Attorney Arndt regarding same; legal research regarding same	1.50 300.00/hr	\$450.00
	DD Add case law to Attorney Scott Abdallah's letter regarding Rule 26 Disclosures	0.90 200.00/hr	\$180.00
2/23/2016	JP Review emails from co-counsel regarding discovery; emails to co-counsel regarding same	0.10 95.00/hr	\$9.50
	SA Review claims file; review discovery responses	5.10 300.00/hr	\$1,530.00
	DD Review emails from Attorney Scott Abdallah	0.20 200.00/hr	\$40.00
2/24/2016	JP Review emails from Attorney Scott Abdallah regarding counsel letter and discovery; revise letter to opposing counsel regarding same; emails to Attorney Delia Druley regarding same; finalize discovery requests for Attorney Scott Abdallah's review and signature; draft letter to opposing counsel for Attorney Scott Abdallah's review and signature regarding same	1.50 95.00/hr	\$142.50
	SF Conference with Attorney Scott Abdallah regarding Motion to Compel; review additional discovery requests	1.00 250.00/hr	\$250.00
	SA Continue review of claims notes; work on second set of discovery responses; work on letter to Attorney Arndt regarding incomplete discovery responses; telephone call with Attorney Lovrien regarding status of case and strategy	5.30 300.00/hr	\$1,590.00

EXHIBIT

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/25/2016	SA	Work on letter to Attorney Arndt regarding discovery deficiencies; work on discovery issues	1.70 300.00/hr	\$510.00
	JP	Conference with Attorney Scott Abdallah regarding discovery; revise same for Attorney Scott Abdallah's review and signature; email to opposing counsel regarding same	0.60 95.00/hr	\$57.00
	DD	Research and add case law to discovery; set up letter to Attorney Mark Arndt; edit and revise same	0.80 200.00/hr	\$160.00
2/26/2016	JP	Review email from opposing counsel regarding discovery	0.10 95.00/hr	\$9.50
3/4/2016	SA	Review letter from Attorney Arndt regarding discovery dispute; follow up regarding same	0.40 300.00/hr	\$120.00
3/7/2016	SA	Work on responses to Attorney Arndt regarding discovery dispute	1.10 300.00/hr	\$330.00
3/8/2016	DD	Review letter from Attorney Mark Arndt regarding discovery	0.30 200.00/hr	\$60.00
3/9/2016	DD	Review case law cited by Attorney Mark Arndt in letter	0.40 200.00/hr	\$80.00
3/10/2016	SA	Work on letter to Attorney Arndt regarding discovery dispute	0.50 300.00/hr	\$150.00
	DD	Review case law cited by defense counsel in discovery letter; research and draft response letter regarding discovery requests	3.50 200.00/hr	\$700.00
3/11/2016	SF	Review and edit letter in Support of Motion to Compel; conference with Attorney Scott Abdallah regarding same; conference with Attorney Delia Druley regarding same; review revisions to letter; follow up conference with Attorney Scott Abdallah regarding same	1.00 250.00/hr	\$250.00
	JP	Review emails from Attorney Delia Druley and Attorney Scott Abdallah regarding counsel letter; revise same for Attorney Scott Abdallah's review	0.20 95.00/hr	\$19.00
	SA	Work on issues regarding discovery dispute; revise letter to Attorney Arndt	1.70 300.00/hr	\$510.00
	DD	Edit and revise letter regarding discovery dispute; email to Jennifer Pravecek and Attorney Scott Abdallah regarding same; conference with Attorney Shannon Falon regarding same	1.10 200.00/hr	\$220.00
3/18/2016	SF	Emails with Attorney Scott Abdallah and Attorney Brett Lovrien regarding Defendant's discovery responses; conference with Attorney Scott Abdallah regarding same	0.30 250.00/hr	\$75.00
	SA	Review letter from Attorney Arndt with supplemental discovery responses; follow up regarding same; update Attorney Lovrien regarding same	2.80 300.00/hr	\$840.00
3/21/2016	SF	Conference with Attorney Scott Abdallah regarding discovery disputes; emails with Attorney Scott Abdallah and Attorney Brett Lovrien regarding same	0.20 250.00/hr	\$50.00
3/22/2016	SA	Prepare letter to Attorney Arndt regarding discovery issues; follow up regarding same	0.80 300.00/hr	\$240.00

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3/23/2016	SF	Emails with Attorney Scott Abdallah regarding discovery disputes; review letters regarding same	0.50 250.00/hr	\$125.00
3/24/2016	JP	Review emails from opposing counsel regarding discovery; review email from Attorney Scott Abdallah regarding same	0.10 95.00/hr	\$9.50
	SF	Emails with Attorney Scott Abdallah regarding discovery issues; research regarding same; review file regarding same	0.50 250.00/hr	\$125.00
	SA	Review and respond to request for discovery extension	0.10 300.00/hr	\$30.00
3/25/2016	SA	Work on issues regarding Defendant's incomplete discovery responses	0.40 300.00/hr	\$120.00
3/27/2016	DD	Review March 17 letter from Attorney Mark Arndt	0.30 200.00/hr	\$60.00
4/5/2016	SA	Review supplemental discovery responses; follow up regarding same	0.70 300.00/hr	\$210.00
	SF	Review Defendant's responses to second set of discovery requests; conference with Attorney Scott Abdallah regarding same	0.50 250.00/hr	\$125.00
4/11/2016	SA	Work on issues regarding discovery dispute	0.60 300.00/hr	\$180.00
	SF	Review file to work on discovery issues; legal research regarding same; conference with Attorney Scott Abdallah regarding same	1.50 250.00/hr	\$375.00
4/12/2016	SF	Review file; legal research regarding discovery issues; draft letter to Attorney Mark Arndt regarding same; conference with Attorney Scott Abdallah regarding same	6.50 250.00/hr	\$1,625.00
	SA	Work on issues regarding discovery	0.60 300.00/hr	\$180.00
4/13/2016	AH	Work on and email letter to Attorney Mark Arndt	0.10	NO CHARGE
	SF	Draft letter to counsel regarding discovery disputes; continued review of file and legal research; conference with Attorney Scott Abdallah regarding same	3.50 250.00/hr	\$875.00
	SA	Work on issues regarding ongoing discovery dispute; review and revise letter to Attorney Arndt regarding same	1.10 300.00/hr	\$330.00
4/20/2016	SA	Telephone call with Attorney Arndt regarding discovery dispute	0.10 300.00/hr	\$30.00
4/25/2016	SF	Review additional production from Progressive; review letter from Attorney Mark Arndt; conference with Attorney Scott Abdallah regarding same; telephone call to Attorney Mark Arndt with Attorney Scott Abdallah regarding same	1.50 250.00/hr	\$375.00
	SA	Review letter from Attorney Arndt with enclosures regarding ongoing discovery issues; review file; legal research; telephone call with Attorney Arndt regarding discovery issues	2.20 300.00/hr	\$660.00
4/26/2016	JP	Review email from opposing counsel's office regarding letter; email to Attorney Scott Abdallah and Attorney Shannon Falon regarding same	0.10 95.00/hr	\$9.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/26/2016	SF	Review Rule 16 Scheduling Order; conference with Attorney Scott Abdallah regarding same and Motion to Compel	0.20 250.00/hr	\$50.00
4/28/2016	SA	Work on discovery dispute issues; telephone call with Attorney Arndt regarding discovery dispute; letter to Attorney Arndt regarding same	1.30 300.00/hr	\$390.00
	SF	Conference with Attorney Scott Abdallah regarding work product case law	0.20 250.00/hr	\$50.00
4/29/2016	SF	Legal research on work product; revise letter to Attorney Mark Arndt regarding same	0.20 250.00/hr	\$50.00
	SA	Work on issues regarding discovery dispute	0.30 300.00/hr	\$90.00
5/2/2016	SF	Review letter from Attorney Mark Arndt regarding discovery disputes; review email from Attorney Mark Arndt regarding same	0.20 250.00/hr	\$50.00
5/3/2016	SF	Emails with Attorney Scott Abdallah and Attorney Mark Arndt regarding discovery issues; work on Motion to Compel; conference with Attorney Scott Abdallah regarding same	1.00 250.00/hr	\$250.00
	SA	Review letter and email from Attorney Arndt regarding discovery dispute; follow up regarding same; work on Motion to Compel	0.80 300.00/hr	\$240.00
5/4/2016	SF	Work on Brief in Support of Motion to Compel	0.50 250.00/hr	\$125.00
5/9/2016	SF	Work on Motion to Compel and Brief in Support of Motion	3.50 250.00/hr	\$875.00
5/10/2016	SF	Continued work on Motion to Compel and Brief in Support of same	1.50 250.00/hr	\$375.00
5/11/2016	SF	Continued work on Motion to Compel Discovery Responses and Brief in Support	6.50 250.00/hr	\$1,625.00
	SA	Work on issues regarding Motion to Compel	0.70 300.00/hr	\$210.00
5/12/2016	SF	Continued work on Motion to Compel and Brief in Support of Motion and Affidavit; conference with Attorney Scott Abdallah regarding same	3.60 250.00/hr	\$900.00
	SA	Review and revise Brief in Support of Motion to Compel; conference with Attorney Shannon Falon regarding same	2.20 300.00/hr	\$660.00
5/13/2016	JP	Work on Motion to Compel documents; conferences with Attorney Shannon Falon regarding same; mark exhibits; e-file same	1.00 95.00/hr	\$95.00
5/18/2016	SA	Work on issues regarding Dr. Segal	0.30 300.00/hr	\$90.00
	SLA	Locate all cases pertaining to Dr. Segal; research and review cases for Motion to Compel	6.50 50.00/hr	\$325.00
5/19/2016	SLA	Continued reviewing Dr. Segal's cases for Motion to Compel	1.50 50.00/hr	\$75.00
5/20/2016	SF	Review memo from Sydney Abdallah on Dr. Segal; emails with Attorney Scott Abdallah regarding same	0.50 250.00/hr	\$125.00

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6/3/2016	SF	Review Defendant's Brief in Response to Motion to Compel; emails with Attorney Scott Abdallah regarding same; review case law	1.50 250.00/hr	\$375.00
6/7/2016	SA	Review Defendant's Brief in Response to Motion to Compel; work on strategy regarding Reply	0.70 300.00/hr	\$210.00
6/10/2016	SF	Review Attorney Scott Abdallah's comments on Defendant's Brief; legal research	1.00 250.00/hr	\$250.00
6/13/2016	SF	Conference with Attorney Scott Abdallah regarding Reply Brief; emails with Attorney Scott Abdallah and Attorney Mark Arndt regarding same	0.20 250.00/hr	\$50.00
	SA	Work on Extension regarding Reply Brief	0.20 300.00/hr	\$60.00
6/14/2016	SF	Review Joint Motion for Extension; review Order granting same	0.20 250.00/hr	\$50.00
	JP	Review emails from Attorney Scott Abdallah and Attorney Shannon Falon regarding Joint Motion to Extend; draft same for Attorney Scott Abdallah and Attorney Shannon Falon's review; email to Attorney Scott Abdallah and Attorney Shannon Falon regarding same; email to opposing counsel regarding same; review email from opposing counsel regarding same; e-file same	0.40 95.00/hr	\$38.00
6/15/2016	JP	Review Order Extending Reply deadline	0.10 95.00/hr	\$9.50
6/30/2016	SA	Review and respond to email from Court regarding hearing; conference with Attorney Shannon Falon regarding same	0.20 300.00/hr	\$60.00
	JP	Review Order regarding Motion to Compel	0.10 95.00/hr	\$9.50
	SF	Emails with Court regarding Oral Argument	0.20 250.00/hr	\$50.00
7/11/2016	SF	Work on Reply Brief in Support of Motion to Compel	1.00 250.00/hr	\$250.00
	SA	Work on strategy regarding Reply Brief	0.40 300.00/hr	\$120.00
7/12/2016	SF	Work on Reply Brief in Support of Motion to Compel	4.00 250.00/hr	\$1,000.00
	SA	Work on Reply Brief; telephone call with Attorney Lovrien regarding same	1.40 300.00/hr	\$420.00
7/13/2016	SF	Work on Reply Brief	2.00 250.00/hr	\$500.00
7/15/2016	SF	Continued work on Motion to Compel; emails with Attorney Scott Abdallah and Attorney Mark Arndt regarding production of employee Sharing Agreement	5.00 250.00/hr	\$1,250.00
7/17/2016	SF	Work on Reply Brief in Support of Motion to Compel	0.50 250.00/hr	\$125.00
7/18/2016	SF	Continued work on Reply Brief	2.60 250.00/hr	\$650.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
7/18/2016	JP	Review emails from Attorney Scott Abdallah regarding upcoming hearing and documents; conferences with Attorney Shannon Falon regarding same; e-file same; review email from Attorney Shannon Falon regarding second counsel Affidavit; draft same for Attorney Shannon Falon's review	2.20 95.00/hr \$209.00
	SA	Review and revise Reply Brief; conference with Attorney Shannon Falon regarding strategy	1.30 300.00/hr \$390.00
7/21/2016	SF	Prepare for Oral Argument on Motion to Compel; argue Motion; review Employee Sharing Agreement	3.00 250.00/hr \$750.00
	SA	Prepare for hearing regarding Motion to Compel; attend hearing; follow up research same	1.80 300.00/hr \$540.00
		For professional services rendered	116.50 \$28,032.50
		SD 6.5% Tax/Time	\$1,822.11
		Total taxes	\$1,822.11
		Total amount of this bill	\$29,854.61
		Balance due	\$29,854.61